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UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CR. NO. 03-00579 HG
)	
Plaintiff,)	UNITED STATES' MOTION TO AMEND
)	FINAL ORDER OF FORFEITURE TO
vs.)	INCLUDE CERTAIN SUBSTITUTE
)	PROPERTY OF DEFENDANT BETTY YI
BETTY YI HERNANDEZ,)	HERNANDEZ; MEMORANDUM IN
a.k.a. "Suki,")	SUPPORT OF UNITED STATES'
)	MOTION TO AMEND FINAL ORDER OF
Defendant.)	FORFEITURE TO INCLUDE CERTAIN
)	SUBSTITUTE PROPERTY OF
)	DEFENDANT BETTY YI HERNANDEZ;
)	DECLARATION OF JASON PA
)	
)	

UNITED STATES' MOTION TO AMEND FINAL ORDER
OF FORFEITURE TO INCLUDE CERTAIN
SUBSTITUTE PROPERTY OF DEFENDANT BETTY YI HERNANDEZ

Pursuant to Fed. R. Crim. P. 32.2(e) and 21 U.S.C.

§ 853(p), the United States of America, by and through its undersigned counsel, hereby moves to amend the Final Order of Forfeiture, entered in this case on October 5, 2005, to include and forfeit certain property belonging to Defendant Betty Yi

Hernandez -- i.e., \$50,000 in United States currency seized from the Chief Clerk's Office for the First Circuit Court, State of Hawaii, on March 31, 2004 (hereinafter referred to as the "Substitute Property") -- as substitute property to partially satisfy the \$905,120.07 personal money judgment entered against Defendant Betty Yi Hernandez as part of the Final Order of Forfeiture.

The United States further requests that it be empowered to immediately commence ancillary proceedings required to address and third-party claims and to finalize the forfeiture of the Substitute Property.

For the reasons set forth in the accompanying memorandum and declaration, the United States respectfully requests that this motion be granted. A proposed order is submitted with this motion for the Court's convenience.

DATED: May 25, 2006, at Honolulu, Hawaii.

EDWARD H. KUBO, JR.
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By /s/ Rachel S. Moriyama
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